

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ROBERT SYLVESTER KELLY, aka
“R. Kelly,”
DERREL McDAVID, and
MILTON BROWN, aka “June Brown”

Case No. 19 CR 567

Honorable Harry D. Leinenweber

GOVERNMENT’S MOTION TO EXTEND TIME TO RESPOND

The United States of America, by its attorney, JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, respectfully moves this Court to extend the time to respond to defendant McDavid’s motion to compel disclosure, R. 247, by two business days, from August 5, 2022, to August 9, 2022. In support of its motion, the government states as follows:

1. On August 3, 2022, defendant filed a motion to compel disclosure seeking broad categories of documents related to communications made by a number of individuals within or formerly of the United States Attorney’s Office for the Northern District of Illinois. R. 247.

2. On August 3, 2022, this Court directed the government to file a response to the motion by close of business on August 5, 2022. R. 249. After the Court entered its order, and on August 5, 2002, the day the government’s response is due, defendant filed a supplemental motion to compel, expanding his request for communications from the United States Attorney’s Office. R. 252.

3. The government seeks additional time to respond to the now expanded motion, so that, among other things, the government can complete its review of the issues defendant raised in his motion. Accordingly, the government requests that the Court extend the time for the government to respond by two business days, until August 9, 2022.

WHEREFORE, the United States respectfully moves the Court to extend the time for the government to respond to the defendant McDavid's motions to compel from August 5, 2022, to August 9, 2022.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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